

Anson, Robie

From: Ostenso, Nile A - DNR [Nile.Ostenso@wisconsin.gov]
Sent: Wednesday, June 12, 2013 10:44 AM
To: Anson, Robie
Cc: Singletary, Lynn L - DNR; Mugan, Tom J - DNR; Pfeifer, David
Subject: RE: Draft Pulliam PMP

Hi Robie,

The data sheet was drafted prior to the public notice period and not all changes to make it current were made. This was intended but some were missed. Some changes are to correct errors.

- The assumption is correct, the variance would end 6/30/2018.
- The data use is found in Fact Sheet IIc, page 65. The date 4/20/2010 needs to be corrected to 4/20/2011. The effluent range is 1.5 ng/L to 39.2 ng/L.
- We are treating the discharge as one to a public drinking water supply even though the Fox River is not. Directly speaking Fox River is not but in a short distance Green Bay is.
- Corrections are needed to show the variance request was noticed 2-20-2013 and there was no hearing. There were no comments on the variance from the public.

Let me know if there is anything else. When you are done commenting, I will send the revised version.

Thanks,

 *Nile A. Ostenso*

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From: Anson, Robie [mailto:anson.robie@epa.gov]
Sent: Wednesday, June 12, 2013 9:17 AM
To: Ostenso, Nile A - DNR
Cc: Singletary, Lynn L - DNR; Mugan, Tom J - DNR; Pfeifer, David
Subject: RE: Draft Pulliam PMP

Nile,

A few questions that I've got based on my review of the most recent revision of the EPA data sheet:

- The data sheet says that the end date of the variance is 6/30/13. I assume it should be 6/30/18. Is this assumption correct?
- The data sheet says that discharge data from 4/2010 to 3/2012 were used to calculate the P99 (48 ng/l) and mean Hg (11 ng/l) levels. It looks to me as though effluent ranged from 3-11 ng/l during this period, so I'm wondering whether additional data may have been used in your calculations. Please let me know which data were used to calculate the P99 and mean.
- At the top of section V, in the check box, you indicate that the receiving water is a public water supply. In the narrative section indicate, you indicate that the Lower Fox River is not a public water supply. Can you please clarify whether Pulliam's effluent will be discharged into a water that is designated for public water supply?
- You indicate that public notice was not given for this variance but then indicate that notice of the variance was included in the public notice of the permit on 2/20/13. Please clarify.

Thank you,

Robie Anson
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From: Ostenso, Nile A - DNR [<mailto:Nile.Ostenso@wisconsin.gov>]
Sent: Wednesday, June 05, 2013 11:24 AM
To: Anson, Robie
Cc: Singletary, Lynn L - DNR; Mugan, Tom J - DNR
Subject: RE: Draft Pulliam PMP

Hi Robie,

Here is the 6-5-2013 updated Fact Sheet, Attachment III. Changes made to the Public Noticed, Proposed Permit and Fact Sheet are based on the various discussion with Pulliam to date. No other public comments were received on the proposed variance. The changes are as follows:

Add to Proposed Permit (p.12) and Fact Sheet (p.17) 5.2 Mercury Pollution Minimization Program, Implement the Mercury Pollution Minimization Program: The permittee shall continue to implement the March 30, 2009 PMP as approved on June 22, 2009, and the June 4, 2013 PMP update.

- a. Source identification: include a quantified mass-balance of all significant sources of mercury at the facility and include a quantified mass-balance of all mercury introduced to the environment through operation of the facility.

Add to Proposed Permit (p.12) and Fact Sheet (p. 17) 5.2 Mercury Pollutant Minimization Program table:
Submit Draft Annual Status Reports:
The permittee shall submit a draft to the Department of the annual status report on the progress of the PMP as required by s. NR 106.145(7), Wis. Adm. Code. Submittal of the first annual status report is required. Due Date: 12-31-2013.

Change/add to Fact Sheet Attachment III

Pollutant Minimization Program for Mercury: (P.75) Permit no. WI-0000965-08-01, section 5.2 required that a Pollution Minimization Plan (PMP) be submitted by March 31, 2009, and implemented by December 31, 2009. The proposed PMP from Pulliam, dated March 30, 2009, was approved by the Department on June 22, 2009.

Annual reports for 2009, 2010, 2011 and 2012, dated: January, 29, 2010, January 27, 2011, January 31, 2012 and January 30, 2013, respectively, were submitted as required by the permit.

An inventory in 2009 found 5.8 pounds of mercury in switches. The switches are being replaced. Batteries and fluorescent lamps are also tracked. Mercury levels were in main process water streams and found to be: 0.184 ng/L (est.) in boiler blowdown, 58.0 ng/L in demineralizer rinse, and 5.23 ng/L in demineralizer sodium hydroxide rinse. These wastewater streams are combined with other process water. The combined wastewater treatment facility influent was found to be 13.4 ng/L and effluent was 0.515 ng/L. Various other treatment methods for lowering mercury were evaluated and the conclusion was not as cost effective as finding a higher grade chemical reagents. In 2011, 350 pounds of fluorescent bulbs and 235 pounds of dry cell batteries were recycled. Using OSHA's standards, EPA's procedures, DHS requirements, and Department rules, Pulliam has implemented a proactive tool for monitoring chemical purchases for mercury content. In 2010, a change in specification of process chemicals was received. The mercury in sodium hydroxide was reduced from 0.5 mg/L to 0.002 mg/L, a 99.6% reduction in concentration. In 2012, the removal of instruments and control devices containing mercury continued. Approximately 329 pounds of fluorescent bulbs and 225 pounds dry cell batteries were recycled in 2012. Since the 2009 inventory, only 65 of the 116 mercury containing devices remain to the removed.

The company has indicated it will continue the PMP effort for mercury into the future. The reissued permit will include the continuation of the PMP in the compliance schedule. The PMP proposal in the public noticed permit is to test for actual sources of mercury in the operation. Subsequent to public notice, Pulliam provide on April 12th, May 23rd and June 4th (attached) more clarification on mercury PMP activities. There is a potential commercial source of sulfuric acid with lower mercury content. The company also provided greater detail on testing wastewater sources for mercury internal to the power plant operation. In discussion following public notice, Pulliam has indicated there is a potential commercial source for lower level sulfuric acid. The company also provided greater detail on testing wastewater sources for mercury internal to the power plant operation and evaluate possible corrective action. The effectiveness of the current treatment system will be evaluated for mercury removal. See June 4, 2013, Draft PMP Action Plan Outline and Response to EPA PMP Comments on the Pulliam PMP, attached. The details of the testing and further updates to the PMP will be finalized as required by the permit compliance schedule.

Added to Fact Sheet Attachment III, Facility Specific Standard Variance Data Sheet, Section VIII: Compliance with Water Quality Standards (p.85). Further testing of inplant process water is proposed to identify sources of mercury and evaluate possible corrective action. The effectiveness of the current treatment system will be evaluated for mercury removal. See June 4th Draft PMP Action Plan Outline and Response to EPA PMP Comments on the Pulliam PMP.

The Attachment III is what will be sent down by Lynn along with the two Department letters.

Let me know if there are any comments or additions needed for the variance.

Thanks,

 *Nile A. Ostenso*

Water Resources Engineer

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These documents will be added to Attachment III of the fact sheet: WPSC Pulliam Fact Sheet Attachment III
Alternative Hg Effluent

From: Ostenso, Nile A - DNR
Sent: Wednesday, June 05, 2013 7:40 AM
To: Anson, Robie (anson.robie@epa.gov)
Cc: Singletary, Lynn L - DNR; Mugan, Tom J - DNR
Subject: FW: Draft Pulliam PMP

Hi Robie,

These documents will be added to Attachment III of the fact sheet: WPSC Pulliam Fact Sheet
Attachment III
Alternative Hg Effluent Limit. An updated Attachment III will be forwarded shortly.

Thanks,



Nile A. Ostenso

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From: Metcalf, Mark W [<mailto:MWMetcalf@integrysgroup.com>]
Sent: Tuesday, June 04, 2013 4:34 PM
To: Ostenso, Nile A - DNR
Subject: Draft Pulliam PMP

Nile,

Attached is a revised draft PMP outline for Pulliam, along with responses to EPA's comments. Please note that WPSC intends to initiate the sampling identified in the outline upon receiving approval of the final PMP from the Department. Feel free to give me a call if you have questions.

Mark

Mark Metcalf

Environmental Consultant - Air & Water | Integrys Business Support, LLC

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